

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA**

INTERNATIONAL HEALTH BRANDS, LLC,  
a Delaware limited liability company,

Plaintiff,

vs.

ASHLEE R. FOY, an individual;  
MICHAEL L. KAUFMAN, an individual;  
and KCM BRANDS, LLC, a Florida limited  
liability company,

Defendants.

Case No. 9:24-cv-80679-DMM

**DECLARATION OF LAUREN BRADFORD**

I, LAUREN BRADFORD, declare:

1. I am over 18 years of age and have never been convicted of a crime involving fraud of dishonesty. I have knowledge of the facts set forth herein, and if called as a witness, could and would testify thereto.

2. I am in-house-counsel of International Health Brands, LLC (“IHB”), Plaintiff in the above-captioned matter. I submit this declaration in support of Defendant’s Expedited Motion to Voluntarily Dismiss Without Prejudice and Stay Proceedings.

3. I have reviewed Defendant’s Expedited Motion to Voluntarily Dismiss Without Prejudice and Stay Proceedings, and the statements therein are true and correct to the best of my knowledge and understanding.

4. During the course of this litigation, IHB has identified a lack of engagement with the Defendants’ business’ social media, which caused IHB to conclude that Defendants are not likely to have made significant profits in their lawless business venture.

5. Because fee-shifting is not guaranteed in this case, IHB has thus concluded that the cost of continuing litigation would likely far exceed the apparent minimal profits Defendants have made.

6. IHB has determined that, as a business decision, it is not presently worth it to continue litigating this matter.

7. Considering that Defendants may argue that IHB's Motion was filed to avoid a potentially adverse ruling on the pending discovery motion, I am noting that this is not the reason IHB is seeking dismissal.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 2/6/2025



LAUREN BRADFORD